

AO 91 (Rev. 08/09) Criminal Complaint

AUSA: Christopher Rawsthorne  
Special Agent: Scott Nedoff, DEA

UNITED STATES DISTRICT COURT

for the  
Eastern District of Michigan

United States of America,  
v.  
Sergio Collins

Case: 4:14-mj-30563  
Assigned To : Hluchaniuk, Michael J.  
Assign. Date : 11/4/2014  
Description: SEALED MATTER (TH)

CRIMINAL COMPLAINT

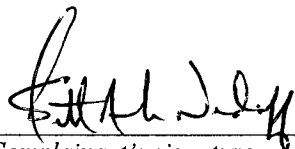
I, the complainant in this case, state that the following is true to the best of my knowledge and belief:

On or about the date(s) of June 11, 2013 & October 2, 2014 , in the county of Genesee , in the  
Eastern District of Michigan , the defendant(s) violated:

<i>Code Section</i>	<i>Offense Description</i>
21 U.S.C. §841(a)	Delivery of Heroin
21 U.S.C. §841(a)	Possession with Intent to Distribute Heroin

This criminal complaint is based on these facts:  
Please See Attachment.

☒ Continued on the attached sheet.

  
Complainant's signature

Scott Nedoff, Special Agent, DEA  
Printed name and title

Sworn to before me and signed in my presence.

Date: 11/4/2014

City and state: Flint, MI

  
Judicial Officer signature

Michael Hluchaniuk, Magistrate Judge  
Printed name and title

**AFFIDAVIT**

I, SCOTT NEDOFF, being duly sworn state the following is true and accurate to the best of my knowledge and belief:

1. I am a Special Agent with the United States Department of Justice, Drug Enforcement Administration (DEA), having been so designated since December 1999. I am a graduate of Michigan State University where I received my B.A. in Criminal Justice. During my career as a DEA Special Agent, I have been involved in numerous investigations concerning the identification and distribution of controlled substances and I have received training in these areas. I have authored numerous affidavits in support of search and seizure warrants, arrest warrants, and Title III wire intercept orders, leading to the seizure of controlled substances and the arrests of drug traffickers. The following is based on my investigation as well as statements from other law enforcement officers and individuals.

2. This affidavit is intended to show only that there is sufficient probable cause for the requested warrant and does not set forth all of my knowledge about this matter. Additionally, unless otherwise noted, wherever in this affidavit I assert that an individual made a statement, that statement is described in substance herein, and is not intended to be a verbatim recitation of such statement.

3. I make this affidavit in support of the arrest of Sergio COLLINS for violations of 21 U.S.C. §841(a), Possession with Intent to Distribute Heroin and Delivery of Heroin.

4. On June 11, 2013, law enforcement officers from the Michigan State Police Flint Area Narcotics Group observed Sergio COLLINS and another individual meet up at the Rite Aid parking lot at Ballenger and Flushing in the city of Flint in the Eastern District of Michigan.

5. They observed an apparent drug transaction between the individual and COLLINS. The other individual was stopped by law enforcement and admitted that he had purchased heroin from COLLINS. This individual handed law enforcement a corner cut tie containing approximately .1 gram of suspected heroin. The Michigan State Crime laboratory would later test and confirm that the substance was heroin.

6. Law enforcement stopped COLLINS on that and recovered \$2157.00 from COLLINS. COLLINS drove a 2007 Dodge Challenger registered to his mother at 1213 Eldorado Avenue in Flint, Michigan.

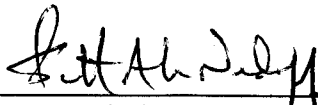
7. On October 2, 2014, Drug Enforcement Administration agents, who had obtained a search warrant for COLLINS' residence at 1213 Eldorado, conducted surveillance and observed COLLINS leaving 1213 Eldorado in the city of Flint. After observing him enter a car with another individual, law enforcement

approached. Approximately 50 grams of heroin were recovered from the vehicle, and COLLINS threw a large amount of United States currency while fleeing from agents. COLLINS was arrested following that foot chase.

8. A search warrant on 1213 Eldorado on that same date resulted in the recovery of approximately 20 grams cocaine base, approximately 3 grams heroin, and approximately \$11,000 United States currency from a room that appeared to be COLLINS' room. Both of the aforementioned items tested positive in field tests for the presence of cocaine base and heroin, respectively. The room contained male clothing and photographs of COLLINS. Moreover, other bedrooms appeared to belong to the other two residents of the home, COLLINS' brother and mother. I believe that those substances were possessed with intent to distribute based on COLLINS' previous behavior and the lack of items in the residence or on COLLINS' person to engage in use of such substances. COLLINS' brother also identified the room as Sergio COLLINS room as well.

9. Based on the above referenced statements, I believe that there is probable cause to issue a complaint against Sergio COLLINS for Delivery of Heroin on June 11, 2013 and Possession with Intent to Distribute Heroin on October 2, 2014.

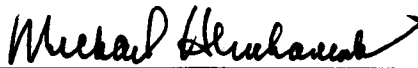
Dated this 4th day of November, 2014



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Scott Nedoff, Special Agent  
Drug Enforcement Administration

Sworn to before me this 4th day of November, 2014.



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Hon. Michael Hluchaniuk  
United States Magistrate Judge